

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JORGE ANIBAL TORRES

Plaintiff,

-vs-

DAVID AMAEL MORAN ASCENCIO :
SMIRNA SALAZAR DE CALLES :
Defendants :

FILED
SCRANTON

FEB 26 2014

PER 
DEPUTY CLERK

Docket Number:

3:14-CV-0349

COMPLAINT
PLAINTIFF DEMANDS JURY TRIAL

1. Plaintiff is a resident of East Stroudsburg, Monroe County Pennsylvania.
2. Defendants are Citizens and resident of the Republic of El Salvador.

Defendant David Amael Moran Ascencio has his office at:

Final Calle Balberd, 2^a Avenida Norte, San Juan Opico, La Libertad, El Salvador.

Defendant Smirna Salazar de Calles has her office at:

Bo Belén 6 Av Nte No 3-8 Sta Tecla, La Libertad, El Salvador. Phone.

3. The jurisdiction of this court is invoked pursuant to 28 U.S.C. § 1332.
4. On or about May 26, 2009 and continuing to February 26, 2014, defendants **David Amael Moran Ascencio**, and **Smirna Salazar de Calles** both attorneys and judicial

officers in the Republic of El Salvador, offered their services and have been demanding and received monies totaling \$455,350.25, to secure the wellbeing, and release of the plaintiff's wife Ana Josefa Galvarina Ramirez Orellana, who is currently detained in El Salvador. Both defendant has promised plaintiff that his wife will be released and trough thievery, fraud, extortion and false information has maintained plaintiff's wife detained in order to secure the payments of monies. The plaintiff has been forced by the Plaintiffs to sell his home and other assets in the Dominican Republic in order to secure the monies demanded by the Defendants and the Defendants have lied to the plaintiff as his wife has never been released and is being used as collateral to keep demanding monies from the plaintiff.


5. WHEREFORE, plaintiff demands:

Money damages in the amount of **\$455,350.25**

Permanent injunction against the defendants from performing certain acts in the future.

- a). Refrain from contacting the Plaintiff to demand any more money.
- b). Refrain from giving false information to the media to damage plaintiff's reputation.

Any further relief the court may deem appropriate.



JORGE A. TORRES
309 Spicebush Dr
East Stroudsburg, PA 18301
570-267-1800

Date: February 26, 2014

Court Name: District Court
Division: 3
Receipt Number: 303030245
Cashier ID: null
Transaction Date: 02/20/2014
Payer Name: JORGE A TORRES

CIVIL FILING FEE
For: JORGE A TORRES
Case/Party: D-PAM-3-14-CV-00349-001
Amount: \$400.00

CREDIT CARD
Amt Tendered: \$400.00

Total Due: \$400.00
Total Tendered: \$400.00
Change Amt: \$0.00

Only when bank clears the check or
verifies credit of funds is the fee
or debit officially paid or
discharged. A \$50.00 fee will be
charged for returned checks.